

# EXHIBIT A

No. 18-824

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**In The  
Supreme Court of the United States**

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THOMAS R. ROGERS AND THE ASSOCIATION OF  
NEW JERSEY RIFLE & PISTOL CLUBS, INC.,

*Petitioners,*

v.

GURBIR S. GREWAL, ET AL.,

*Respondents.*

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**On Petition For Writ Of Certiorari  
To The United States Court Of Appeals  
For The Third Circuit**

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**BRIEF IN OPPOSITION TO  
PETITION FOR A WRIT OF CERTIORARI**

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670 F.3d at 1271 (Kavanaugh, J., dissenting). The Court instead has chosen to “maintain the balance historically and traditionally struck in the United States between public safety and the individual right to keep arms—a history and tradition that *Heller* affirmed and adopted.” *Id.* But the request in this case seeks to upend that balance, establishing an unprecedented right to carry loaded firearms publicly at any time and for any reason—despite longstanding law enforcement and legislative objections. At bottom, Petitioners have not come close to establishing the necessary factual or legal predicate for doing so, and they have not provided this Court with a proper vehicle for addressing that question.<sup>8</sup>




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<sup>8</sup> While the above discussion offers sufficient basis to deny this petition for certiorari altogether, this Court could also hold the petition pending this Court’s decision in *New York State Rifle & Pistol Association v. City of New York*, No. 18-280. Subsequent to the filing of this Petition, this Court granted the writ in *NYSRPA*, which asks “[w]hether [New York] City’s ban on transporting a licensed, locked, and unloaded handgun to a home or shooting range outside city limits is consistent with the Second Amendment, the Commerce Clause, and the constitutional right to travel.” Since disposition of this petition may be affected by the ultimate resolution of *NYSRPA*, the petition could be held pending that decision. Doing so is an established part of this Court’s practice, advances judicial economy, and signals nothing about the significance of the underlying constitutional provision, statute, or rule.

## CONCLUSION

The petition for a writ of certiorari should be denied.

Respectfully submitted,

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